

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of the Commission's Rules ) ET Docket No. 98-237  
With Regard to the 3650-3700 MHz )  
Government Transfer Band )

**REPLY COMMENTS**

Sprint Corporation ("Sprint") hereby respectfully submits its reply comments on the Commission's *Notice of Proposed Rule Making and Order ("NPRM")*, FCC 98-337, released December 18, 1998 in the above-captioned proceeding.

In their comments, the satellite industry expressed their concern about the Commission's proposal to restrict the use of the 3650-3700 MHz band for Fixed Satellite Service ("FSS") by no longer accepting applications for new earth stations or major modifications to existing earth stations in this band. This band is part of the larger 3400-4200 MHz band which is allocated internationally to FSS. Comsat at 3. As GE Americom points out (at 3): "Consistent global spectrum allocations permit international satellite systems to make the most efficient possible use of frequencies. Consistent allocations also reduce the costs of building and operating satellites, including the ability of satellites to provide back-up protection to one another." Comsat notes that the proposed restrictions will be detrimental to the growth of new international services, such as IBS and Internet via satellite (at 8). Thus, as Sprint stated in its comments, this band is very important to the provision of international satellite service and its use should not be restricted.

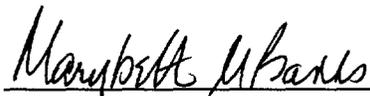
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Comsearch, the firm which Sprint employs for coordination for its earth stations, filed comments which explain the current coordination process and its success in sharing the band. Comsearch states: "As evidenced by the numerous earth stations and terrestrial channel assignments coexisting over the years, mitigation techniques have been successfully employed to facilitate sharing in the C band" (at 3, fn. omitted). To demonstrate such coexistence, Comsearch provides an example of point-to-point microwave facilities within the contours of an earth station in Whitinsville, MA (at 4). If coordination is performed and incumbents notified of the deployment of new systems, the spectrum could be shared by the earth stations and new Fixed Wireless Access services (*id.*). Thus, Fixed Wireless Access services could develop in this band without imposing the restrictions on existing earth stations that the Commission has proposed.

Therefore, Sprint again urges the Commission to grandfather existing earth stations operating in the 3650-3700 MHz band and to permit applications for major modifications to the licenses in this band, as well as applications for new licenses at existing earth station sites.

Respectfully submitted,  
SPRINT CORPORATION

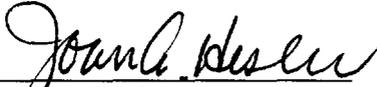


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